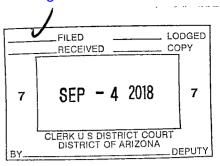
1 ELIZABETH A. STRANGE First Assistant United States Attorney 2 District of Arizona CHRISTINA M. VEJAR Assistant U.S. Attorney 3 United States Courthouse 405 W. Congress Street, Suite 4800 4 Tucson, Arizona 85701 Telephone: 520-620-7300 Email: Christina.vejar@usdoj.doj 5 6 Attorneys for Plaintiff 7 8



## IN THE UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF ARIZONA

9 United States of America. CR 18-01583-TUC-JGZ-BGM 10 Plaintiff, 11 vs. 12 AND MAINTAIN NAMES OF REDACTED 13 Redacted Defendant #1, et al 14 Defendants. 15

GOVERNMENT'S MOTION TO UNSEAL CASE, FILE REDACTED INDICTMENTS, MAKE PUBLIC THE NAME OF DEFENDANTS #3, #4 and #6,

**DEFENDANTS UNDER SEAL** 

(Paper Filed In A Sealed Case: Certain Defendant Names to Remain Redacted)

The United States of America, by and through its undersigned attorneys. respectfully requests that in order to balance the need for public filing of documents relating to the arrested defendants against the need to maintain the names of the fugitives under seal, that this Court enter an Order to:

1. Unseal the case.

16

17

18

19

20

21

22

23

24

25

26

27

28

- 2. Make public the name of NESTOR JAVIER PADILLA, Defendant #3, YOLANDA MARTINEZ, Defendant #4 and YESICA ALVAREZ-GLADYS CASTILLO, Defendant #6.
- 3. File in the Court Docket the attached redacted indictments, which reveal the names of the defendants who may be made public and redacts the names of those who remain fugitives. (Attachment A.)
- Maintain the names of any redacted defendants under seal by referring them as "REDACTED DEFENDANT" in the public record.

- 5. Authorize the Clerk, after the arrest of a redacted defendant, to publicly docket pleadings using the defendant's actual name. The government will, as soon as practicable after the arrest of a redacted defendant, move to unseal that defendant's name and move to unseal the original indictment or file a redacted indictment revealing the defendant's name.
- 6. It is the intent of the undersigned counsel to unseal the entire case with the exception of the redacted defendants referred to above, and the following specific documents: the Unredacted Indictment [Doc. 3], the Motion to Seal Indictment [Doc. 1], the Order to Seal Indictment [Doc. 2].
- 7. Pursuant to the March 2004 Judicial Conference guidance, certain criminal documents shall not be included in the public case file and should not be made available to the public at the courthouse or via remote electronic access: unexecuted summonses or warrants of any kind (e.g., search warrants, arrest warrants); pretrial bail or presentence investigation reports; statements of reasons in the judgment of conviction; juvenile records; documents containing identifying information about jurors or potential jurors; financial affidavits filed in seeking representation pursuant to the Criminal Justice Act; *ex parte* requests for authorization of investigative; and expert or other services pursuant to the Criminal Justice Act. Accordingly, the government requests that documents in those categories remain sealed without further order of the Court.
- 8. The government further requests authorization to disclose the name(s) of any redacted defendant(s), and any indictments that disclose these names, as necessary for law enforcement purposes, to further the prosecution of the case, and when filing any motion(s) to make public the names of redacted defendant(s).

Respectfully submitted this 4 day of September, 2018.

ELIZABETH A. STRANGE
First Assistant United States Attorney
District of Arizona

CHRISTYNA M. VEJAI Assistant U.S. Attorney